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23 Attorneys for Plaintiff
24 JOELLEN HRUBY

25 UNITED STATES DISTRICT COURT OF CALIFORNIA

26 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

27 JOELLEN HRUBY,

No. CV 07-6031 MHP

28 Plaintiff,

**STIPULATED REQUEST FOR
ORDER CHANGING TIME;
[PROPOSED] ORDER THEREON
[Local Rule 6-21, 7-12]**

vs.

ALLIED PROPERTY AND CASUALTY
INSURANCE COMPANY, a corporation;
AMCO INSURANCE COMPANY, a
corporation, and DOES 1 to 10, inclusive,

Complaint Filed: 09/21/07
Trial Date: None Set


Defendants.

2. The initial Case Management Conference shall be scheduled for May 30, 2008, or on any day thereafter as the court shall order.

DATED: March 6, 2008

RUDLOFF WOOD & BARROWS LLP

By:

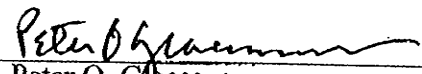

G. Edward Rudloff, Jr.
Edward P. Murphy
Anna A. Chopova

Attorneys for Defendants ALLIED PROPERTY
AND CASUALTY INSURANCE COMPANY
and AMCO INSURANCE COMPANY

DATED: March 5, 2008

LOMBARDI, LOPER & CONANT, LLP

By:


Peter O. Ghessner

Attorneys for Plaintiff JOELLEN HRUBY

RUDLOFF WOOD & BARROWS LLP
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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Defendant Allied Property and Casualty Insurance Company and Defendant AMCO
3 Insurance Company (collectively "AMCO"), by and through its attorneys of record, Rudloff
4 Wood and Barrows LLP, and Plaintiff JoEllen Hruby ("Plaintiff"), by and through her attorneys of
5 record, Lombardi, Loper & Conant LLP, hereby stipulate:

6 WHEREAS, this is the parties' first request for an order extending time; and

7 WHEREAS, the parties are presently engaged in settlement discussions for purposes of
8 resolving this case; and

9 WHEREAS, the parties agree that a 60-day extension of the date for the Case Management
10 Conference, and related dates triggered by it for the completion of a Joint Case Management
11 Statement, Initial Disclosures and the initial meet-and-confer per FRCP 26(f), would allow the
12 parties to focus their efforts on resolving this case through settlement; and

13 WHEREAS, a settlement will obviate the initial Case Management Conference, thereby
14 saving this Court's time and resources;

15 THERETOFORE THE PARTIES STIPULATE AS FOLLOWS:

- 16 1. The parties agree to extend the date for the Case Management Conference in Reassigned Case,
17 and all related dates triggered by it: Joint Case Management Statement, Initial Disclosures and
18 FRCP(26)(f) meet-and-confer, by 60 days.

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STIPULATED REQUEST FOR ORDER CHANGING TIME; [PROPOSED] ORDER THEREON

[LOCAL RULE 6-2, 7-12]

CASE NO. CV 07-6031 MHP

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
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EMERYVILLE, CALIFORNIA 94808
(510) 740-1500

1 [PROPOSED] ORDER

2

3 IT IS SO ORDERED, based on the Stipulation set forth above, and GOOD CAUSE

4 APPEARING that

5 1. The date for the Case Management Conference in Reassigned Case is continued to

6 _____.

7 2. All dates triggered by the Case Management Conference: FRCP 26(f) meet-and-
8 confer, Initial Disclosures and Joint Case Management Statement, shall be calculated from the
9 date of the Case Management Conference, _____.

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11
12 DATED: _____, 2008

13 THE HONORABLE MARILYN HALL PATEL
14 United States District Court
15 Northern District of California

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

CERTIFICATE OF SERVICE BY MAIL

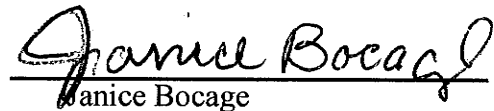
I am over the age of eighteen years and not a party to the within cause. I am employed in the County of Alameda, California. My business address is Rudloff Wood & Barrows LLP, 2000 Powell Street, Suite 900, Emeryville, California 94608.

I am personally and readily familiar with the business practice of Rudloff Wood & Barrows LLP for the collection and processing of correspondence for mailing with the United States Postal Service, pursuant to which mail placed for collection at designated stations in the ordinary course of business is deposited the same day, proper postage prepaid, with the United States Postal Service.

On March 6, 2008, I served the within: **STIPULATED REQUEST FOR ORDER CHANGING TIME: [PROPOSED] ORDER THEREON [Local Rule 6-21, 7-12]** on the parties named below in this action by placing a true copy thereof enclosed in a sealed envelope for collection and mailing on this date, following ordinary business practices, addressed as follows:

Peter O. Glaessner, Esq.
Lombardi Loper & Conant LLP
Lake Merritt Plaza
1999 Harrison Street, Suite 2600
Oakland, CA 94612

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on March 6, 2008, at Emeryville, California.


Janice Bocage